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California Civil Rights Department
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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF CALIFORNIA
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14 **HINDU AMERICAN FOUNDATION, INC.,**
15 **a Florida Not-For-Profit Corporation;**
16 **SAMIR KALRA; MIHIR MEGHANI;**
17 **SANGEETHA SHANKAR; DILIP AMIN,**
SUNDAR IYER, RAMANA KOMPELLA
as individuals; and DOE PLAINTIFFS ONE
TO THREE,

18 Plaintiffs,

19 v.

20 **KEVIN KISH, an individual, in his official**
21 **capacity as Director of the California Civil**
22 **Rights Department; and Does 1-50,**
inclusive,

23 Defendants.
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Case No. 2:22-CV-01656-DAD-JDP

DECLARATION OF CARLY J.
MUNSON IN SUPPORT OF
UNOPPOSED APPLICATION FOR
EXTENSION OF TIME TO RESPOND
TO FIRST AMENDED COMPLAINT

Complaint filed: September 20, 2022

Judge: Hon. Dale A. Drozd

1 I, Carly J. Munson, declare as follows:

2 1. I am an attorney admitted to practice before the courts of the State of California and
3 before this Court. I am a Deputy Attorney General with the Office of the Attorney General,
4 which represents Defendant Kevin Kish in his official capacity as the Director of the California
5 Civil Rights Department in the above-captioned matter.

6 2. I make this declaration in support of Defendant Kish's Unopposed Application for
7 Extension of Time to Respond to First Amended Complaint. If called as a witness, I would and
8 could competently testify to the facts stated herein, all of which are within my personal
9 knowledge.

10 3. On September 21, 2023, the Hindu American Foundation filed its First Amended
11 Complaint against Defendant Kish. (ECF. No. 21). The First Amended Complaint includes two
12 new claims in addition to amended versions of the three original claims. (*Id.*) The First
13 Amended Complaint also lists nine new plaintiffs, including three identified only as "Doe One,"
14 "Doe Two," and "Doe Three." (*Id.*) To date, we have not been informed of the identity of these
15 plaintiffs.

16 4. Defendant Kish anticipates filing one or more motions in response to Plaintiffs' First
17 Amended Complaint. However, in light of Defendant's counsel's current litigation deadlines,
18 pre-scheduled travel, and the parties' meet and confer obligations under the Federal Rules of Civil
19 Procedure, Local Rules, and this Court's Standing Orders, Defendant's counsel lacks sufficient
20 time to prepare Defendant's motions prior to the current October 5, 2023 deadline to respond.

21 5. Defendant's counsel have several pre-existing filing deadlines in October 2023 in
22 other matters that have been set by court order, including briefing on dispositive motions in
23 California Superior Courts and in a matter before the California Court of Appeal.

24 6. Further, I was out of the office from September 21-27, 2023, due to pre-scheduled
25 travel plans. I am lead counsel for Defendant Kish on this matter.

26 7. On September 28, 2023, I sent an email to Tim Travelstead, counsel for Plaintiffs,
27 informing him that Defendant Kish requires an additional 45 days to evaluate and consider
28 Plaintiffs' First Amended Complaint, meet and confer with opposing counsel on any motions, and

1 file his responsive pleading and/or motion(s). Mr. Travelstead replied the same day and agreed to
2 the requested 45-day extension.

3 8. Defendant Kish has not sought or been granted any prior extensions of time to
4 respond to the Plaintiffs' First Amended Complaint.

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct, and this declaration was executed at Sacramento, California this
7 29th day of September, 2023.

8 /s/ Carly J. Munson

9 CARLY J. MUNSON
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